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11 Attorneys for Defendant
12 GOOGLE INC.

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 ORACLE AMERICA, INC.,

17 Plaintiffs,

18 v.

19 GOOGLE INC.,

20 Defendant.

21 Case No. 3:10-cv-03561 WHA

22 **DECLARATION OF RENNY HWANG IN
23 SUPPORT OF ORACLE'S
24 ADMINISTRATIVE MOTION TO SEAL
(ECF 2054)**

25 Dept. Courtroom 8, 19th Fl.
26 Judge: Hon. William Alsup

1 I, RENNY HWANG, declare as follows:

2 1. I am an attorney employed by Google Inc. (“Google”), where I have served as
3 senior litigation counsel for the last six years. My job responsibilities include, but are not limited
4 to, supervising our outside counsel in connection with litigation matters (such as this one), as well
5 as familiarizing myself with the areas of Google’s businesses and documentation concerning
6 those businesses as they relate to litigation matters under my supervision. I submit this
7 declaration in support of Oracle’s Administrative Motion to File Under Seal. *See* ECF No. 2054.
8 I have knowledge of the facts set forth herein, and if called upon as a witness, I could testify to
9 them competently under oath.

10 2. I have reviewed the Declaration of Annette L. Hurst Per ECF 2052 and 2053
11 (“Hurst Declaration”). *See* ECF No. 2054-4. The following portions of the Hurst Declaration
12 contain highly sensitive and confidential information regarding Google’s internal business
13 strategy and product development plans: page 3, lines 13 and 14 (portions quoting ECF No.
14 2047-8 and parenthetical following quoted material).

15 3. Google keeps the information identified in paragraph 2 confidential and public
16 disclosure of this information would provide a competitive advantage to Google’s competitors
17 and could have negative effects on Google’s business. In particular, public disclosure of product
18 development information could allow competitors access to confidential information regarding
19 Google’s business plans.

20 4. The above-listed portions of the Hurst Declaration should therefore be sealed.
21 Google does not seek to seal other portions of the Hurst Declaration that summarize, quote from,
22 or reproduce materials that have been designated by Google as “CONFIDENTIAL” or
23 “HIGHLY-CONFIDENTIAL – ATTORNEY’S EYE’S ONLY” under the Stipulated Protective
24 Order in this case. Google, however, does maintain its confidentiality designation of the
25 underlying materials.

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1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct to the best of my knowledge.

3 Executed this 13th day of September, 2016 at Sunnyvale, California.

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5 By:
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RENNY HWANG

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